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**To:** [Sheldrake, Sean](#)  
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**Subject:** Draft DEQ Comments on Gasco BOD WP for Discussion  
**Date:** Wednesday, September 6, 2017 6:52:15 PM  
**Attachments:** [20170906-DEQ Draft Comments-NWN BOD Work Plan.docx](#)

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Sean-

DEQ has reviewed the NW Natural "Gasco Sediments Site Cleanup Action, Pre-Remedial Basis of Design Technical Evaluations Work Plan" (Work Plan) dated July 13, 2017. The Work Plan presents NW Natural's approach for developing a remedial design for the Gasco Sediments Site consistent with the Portland Harbor Record of Decision (ROD). DEQ recognizes that this document is the first major design deliverable for the Harbor following EPA's issuance of the ROD in January 2017. As such, this document proposes design methodologies, performance standards, and interpretations of the ROD design requirements which will set an important precedence for how EPA's ROD will be applied Harbor-wide. In the interest of maintaining close coordination with EPA during DEQ's work on the upland remedy and as support agency for the in-water remedy, DEQ would like to discuss our draft comments (attached) prior to incorporation into EPA's formal comment set.

Specifically, DEQ would like to consult with EPA on the approach to addressing the following issues highlighted through our review of NW Natural's proposed basis of design evaluations.

- Lateral and vertical delineation of sediment management areas (SMAs) and riverbanks requiring remediation
- Extent of ROD flexibility in determining areas suitable for capping versus dredging
- Alignment of proposed design performance standards with applicable points of compliance and development of a performance monitoring program
- Application and utility of the cleanup levels during proposed design evaluations
- Criteria for evaluating upland and in-water structures impacted by the sediment remedy

While we appreciate the need for timely issuance of our comments, we also acknowledge the importance of both agencies coming to a mutual understanding of EPA's expectations for remedial design, so that we're all moving forward in the same direction. As discussed, we look forward to meeting with you and your team during our regularly scheduled time on Friday 9/8.

Thanks,

**Sarah Greenfield, PE**

**NW Region Cleanup Program**

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